

Exhibit 1

DECLARATION OF BILL WHITMIRE

I, Bill Whitmire, declare as follows:

1. I am currently the Vice President of Risk Management of Shaw Industries, Inc., a subsidiary of Shaw Industries, Group, Inc., a carpet manufacturing business headquartered in Dalton, Georgia (Shaw Industries, Inc. and Shaw Industries Group, Inc. are collectively referred to as "SHAW").

2. I have personal knowledge of the facts set forth herein, and if called as a witness to testify thereto, I could competently and truthfully do so.

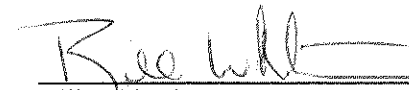
3. After review and investigation, SHAW has discovered that Fireman's Fund Insurance Company ("Fireman's Fund") policy no. MXX03597972, which incepted January 5, 1978 and was cancelled effective January 5, 1980 (the "1978 Fireman's Fund Policy"), was issued to a separate and unrelated Shaw Industries, Inc. located in Marietta, Georgia that, upon information and belief, merged into a separate and unrelated entity known as Shaw Manufacturing Co., Inc.

4. The 1978 Fireman's Fund Policy does not afford coverage to SHAW. More particularly, the 1978 Fireman's Fund Policy does not afford coverage to SHAW for the lawsuits styled *The Water Works and Sewer Board of the City of Gadsden v. 3M Company, Inc., et al.*, case no. 31-cv-2016-900676.00; *The Water Works and Sewer Board of the Town of Centre v. 3M Company, Inc., et al.*, case no. 31-cv-2017-900049.00; *The City of Rome, Georgia v. 3M Company, Inc., et al.*, case no. 19-cv-02405-JFL-003; *Jarrod Johnson, individually and on behalf of a class of persons similarly situated v. 3M Company, Inc., et al.*, case no. 4:20-cv-0008-AT; *Shelby County, Alabama and Talladega County, Alabama v. 3M Company, Inc., et al.*, case no. 1:23-cv-00609-CLM; and *Shelby County, Alabama and Talladega County, Alabama v. 3M Company, Inc., et al.*, case no. 61-cv-2023-900112.00 (the "PFAS Lawsuits").

5. SHAW acknowledges that no defense or indemnity obligations are owed by Fireman's Fund under the 1978 Fireman's Fund Policy for the claims and damages asserted against SHAW in the PFAS Lawsuits and/or any other claims arising out of SHAW's carpet manufacturing business, and SHAW hereby withdraws all tenders and notices of the PFAS

1 Lawsuits and any other claims under the 1978 Fireman's Fund Policy.
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4 I declare under penalty of perjury under the laws of the State of Georgia that the foregoing
5 is true and correct and that this declaration was executed on this 30 day of November, 2023, at
6 Dalton, Georgia.

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9 Bill Whitmire
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